

CODE OF BUSINESS CONDUCT

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OUR VALUES



Our Code of Business Conduct and Ethics is built on a strong set of Values. These Values reinforce and encourage the qualities that help us become a successful company. They are the basic building blocks of our culture. While our strategy or mission of the company may change over time, our Values are enduring. We are all expected to live by these Values and abide by the Code.

Accountability

We take full responsibility for the formal requirements including the recruitment process, remuneration, and other benefits available for consultants. NATEK business is founded on trust. Our handshake is our bond and we stand behind our promises.

All employees know they have an impact on the company, its processes and our working environment. As we are not a big corporation, each performance is visible. The set of working instructions and processes has been designed to help our employees in their performance. We encourage accountability and we hold each other accountable for our performance.

Expertise

Our teams have strong expertise concerning industry specifics and market capacities in order to find the best-suited solutions for our customers.

Our employees are experts in their respective fields. Upskilling programs and academies are addressed on annual basis to ensure continuous improvement of our processes toward our customers.

Partnership

Thanks to managers who have gained experience in managing projects from various industries we develop personalized solutions suiting our customers' needs. Our business is built on long-lasting relationships. We treat our employees, customers and partners with fairness, and respect, just as we would want them to treat us. Our goal is to build long-term relationships and trusted partnerships.

We work as a team. We cooperate within and across businesses to achieve shared goals.



OUR STANDARDS



Our Code of Business Conduct and Ethics is an integral part of being a NATEK employee, supplier, or contractor. It defines our standards of business conduct and establishes the behaviours expected of us in our daily activities when performing professional activities. While it may not address every single issue that will arise, it provides answers to frequently asked questions.

By following our Code, we uphold the NATEK Values and maintain our reputation as a trustworthy partner. It applies to all of us — employees and contracted staff, and to all managers and members of the Board. What is more, we expect our suppliers, contractors, and other partners to follow similar principles when working with us or on our behalf.

Failure to comply with the Code and related policies, or applicable laws, may result in disciplinary action, including termination of employment or services. If criminal activity is identified, we may also contact relevant authorities.

Knowing your responsibilities

We are all expected to:

► Know the code

We must read and understand our Code and all related company policies, procedures and standards that apply to our daily work.

► Know the law

We must follow the laws and regulations that apply to us, regardless of where we are located. Investigations into potential violations are damaging to our reputation.

► Raise concerns and ask questions

All employees are encouraged to share their concerns, ask questions and seek advice. True to our company values, we all have a responsibility to report actual or suspected violations of this Code. By doing so, we uphold our company Values and our commitment to ethical business practices. It also allows us to address problems and concerns before they become serious issues or put the company in jeopardy. We do not allow any form of retaliation against anyone who, in good faith, raises a concern or reports any type of misconduct. Reporting in good faith means providing all of the information one has with the belief that such information is true.



OUR WORKPLACE AND WORKING ENVIRONMENT





Equal employment opportunities

We are devoted to providing a workplace free from discrimination, where everyone is treated with equal respect. We aim to create an environment where everyone feels included and where everyone treats each other with mutual trust. We are creating a safe and friendly environment for everyone.

Discrimination of any type is strictly prohibited. NATEK is dedicated to providing equal employment opportunities for all employees and applicants. We employ and promote employees exclusively on the basis of the qualifications and abilities needed for the performance of the work. Discrimination against is banned, whether on grounds of race, color, religion, gender, national origin, age, sexual orientation, disability status, or any other basis that is protected under the law. This is also true to how we treat our contractors, partners, customers, and suppliers. The principle of equal rights for the same obligations and prohibition of any discrimination is one of the NATEK principles which we reinforce on a group level, including in the statement of equal treatment signed at the beginning of employment.



Diversity and inclusion

NATEK is an international company and much of our success comes from the fact that we value diversity in the workplace. As a responsible employer, NATEK has introduced a strategy of respecting Diversity, and Inclusion in its DNA.

Our diverse workforce promotes an open, multicultural and inclusive working environment. Diversity and Inclusion in NATEK is the order of every day. Much of our success stems from a diversified and dispersed structure, which is successfully developing in Bulgaria, Czechia, Poland, and Slovakia, and promoting an open, multicultural, and inclusive working environment. On its board, NATEK has had employees and contractors from over 45 nationalities from many age groups. We believe that our team thrives because of the various backgrounds of its members. For that reason, NATEK also made a commitment to have a 50% female voice on board.

We work with a wide range of diverse customer and supplier groups in our business activity. We believe that diversity is our power and a great development opportunity.

We are OPEN to CHANGE in a CHANGING and DIVERSE environment.



No harassment

Any form of harassment, including sexual harassment and workplace bullying is forbidden. Harassment can be physical, verbal, or visual and its' effect is creating an intimidating, hostile, or offensive work environment. Such behavior is illicit irrespective of the location, both in the office and in any other place where work activities are performed.



Violence at the workplace

We do not tolerate violence, both physical and verbal. It includes all acts or threats of violence in the workplace or outside of it when performing activities connected with our work.



Substance abuse

All employees must be free from the influence of alcohol or any other substance that could prevent them from performing their jobs safely and effectively. This is true whether we are on or off company premises. Alcohol at certain company events is permissible if used safely and responsibly.



Safe and healthy workplace

Providing a healthy and safe workplace is a critical responsibility that we don't compromise on. We have a responsibility to our colleagues to speak up about safety and support the continuous development of our safety culture. We must be aware of and follow health and safety laws, regulations, and policies related to our work activities in all countries and NATEK branches, as well as take actions to reduce risk. We are all accountable for behaving safely and following local procedures.



Employee information

During the time of employment, employees entrust certain aspects of their personal information to the company, and we collect them for legitimate purposes. Such data includes any information that identifies a living person, such as government-issued identification numbers, email addresses, home addresses, and telephone numbers, as well as personal financial and medical information. NATEK is dedicated to the proper protection, management, and use of personal information. Employees have access solely to data containing personal information where required by their job function.



OUR COMPANY

WORK IT
WITH US





Books and records

We maintain accurate books and records in accordance with the securities and accounting laws of the countries in which we operate. These documents form the basis of our earnings statements, financial reports, and other public disclosures, and they guide our business actions and decisions. Employees are responsible for keeping accurate records of transactions, time reports, expenses, and other financial records. All must also comply with our company's system of internal controls over financial reporting. We cooperate with internal and external auditors reviewing our business activities. This responsibility also applies to government investigators. We must never interfere with or seek to improperly influence any audits or examinations of our company.



Managing records

We know and follow applicable requirements stating how long we should retain company records, how and when to destroy them. This includes documents connected with the completion of an action, transaction, decision, or other significant company activity. They can be stored in any location, including on the internet, intranet, or in the cloud. Company records can include all forms of electronic messaging, and records in company databases, electronic systems, and our shared networks.



Company property

We treat company property with the same care and respect that we do on our own. We protect our physical property from theft, damage, loss, or misuse. This includes facilities, vehicles, computers, mobile devices, other business equipment, and supplies. We do not use company assets for activities that violate the Code.

Intellectual property provides us with a competitive advantage in the marketplace and includes anything we create on company time, at the company's expense, or within the scope of our work activities. Such property belongs to the company, regardless of whether it can be patented or protected by copyright or is a trade secret or trademark, and we must protect it.



Communication

NATEK's good name and reputation are intangible assets that shall be protected. Our external communication should convey an accurate message and a consistent view of our business and comply with the standards of the countries where we operate. We must carefully manage our brand, and properly handle any form of communication with clients, candidates and any other interlocutors.



Website

Our website provides our potential and existing customers with a detailed overview of our standard solutions, capabilities, and services offered. It is also our tool focusing on establishing a closer relationship with them. Our goal with the website is also to give access to information enabling candidates to find interesting open positions and other information about the recruitment process and working at NATEK quickly.



Social media presence and networking in social media

Social media platforms include portals such as Facebook, Instagram, Twitter and LinkedIn; blogs; photo, and video sharing sites; forums; and chat rooms. While NATEK values the use of social media to strengthen its connection with candidates, employees, customers, and other stakeholders, we recognize the need to do so responsibly. Every employee with a public account represents the company brand, especially where any communication involves NATEK, its operations, people, competitors, and/or other business-related issues.



OUR PARTNERS



Fair treatment

NATEK puts great value on business relationships. Our business partners include our customers, suppliers, vendors, and other third parties. All interactions with our business partners must be nothing but fair and ethical.

Third-party information

We protect the confidential information supplied to us by our business partners. We follow the confidentiality provisions of any contractual agreements, and we never misuse confidential information provided by third parties.

Supplier selection

All suppliers of goods and services are treated equally and with honesty. The selection process is based on fair guidelines. We select suppliers objectively and communicate with them clearly. We also expect them to uphold the principles of integrity, honesty, and ethical business conduct.

Our services

Promotion of our Services and our marketing activities must be conducted with honesty and integrity. We must be truthful when representing the quality of our services.

Anti-money laundering

Money laundering is the process by which funds generated through criminal activity are processed through commercial transactions in order to conceal the source of the proceeds or evade taxes. To help prevent money laundering, compliance due diligence must be performed prior to entering into certain engagements with business partners.

Competition and competitive information

In order to grow and achieve our business goals, we engage in fair competition and comply with antitrust and competition laws. We avoid the disclosure of any confidential company information to competitors and exercise caution when interacting with competitors at industry or networking events. We may not gather information about our competitors using deception, theft, or any other illegal or unethical means.

Bribery and corruption

No form of bribery or any other improper payment is ever acceptable and will not be tolerated. We don't accept or request improper payments and all employees must report any requests or offers of such kind made to them.

Gifts for business partners

Business gifts can help strengthen or develop strong relationships with our business partners and other third parties. At the same time, we have to base on our good judgment whenever offering or accepting such gifts. Benefits must not be intended to improperly influence the actions of the recipient. All gifts, including meals, have to be appropriate, properly recorded, and provided for a legitimate business purpose.

Conflict of interest

Certain personal relationships or transactions, or interactions with third parties, create conflicts of interest. We must be transparent with the company when entering into certain personal relationships or transactions or when interacting with the company's business partners and other third parties.

OUR RESPONSIBILITIES



Corporate Social Responsibility is the core of our operations and the way we do business. We are committed to managing the environmental, social, and economic impacts of our business.

We want to contribute to sustainable environmental and social development where we operate. We are committed to promoting health and safety and ensuring compliance with fair wage and hour laws. We encourage participation in and support for charitable organizations and activities. We do not tolerate, or permit the use of child, forced or involuntary labour.

NATEK shall not knowingly conduct business with any partner who violates these standards.

NATEK environmental policy

We traditionally strive to contribute to higher quality, more comfortable lifestyle, and customer satisfaction in its whole area by providing fully valuable services. At the same time, and with the introduction of our Environmental Policy, NATEK works to minimize the environmental burden of these various activities and promote greater harmony, thereby contributing to the presentation and improvement of a healthy environment.

We are devoted to protecting the environment in all areas of our operations where applicable. We strive to meet all applicable environmental laws and regulations. What is more, we have designed our own policies and guidelines for reducing or eliminating the environmental impact of our activities.

NATEK Environmental Policy is based on following commitments which whole NATEK Environmental Management system undertakes:

▶ **Cooperation with authorities and local entities**

NATEK observes environment-related rules and regulations imposed by local and regional authorities and supports legislatively promoted environmental conservation and prevention of pollution. The company voluntarily follows non-binding legislative recommendations and opinions which relate to the improvement of the global environment.

▶ **Programs for performance measurement and environmental goals**

NATEK establishes proper programs and continues to improve these programs which are measuring and controlling Company's performance associated with applicable environmental aspects. As a part of these programs, we set voluntary goals to achieve improvements in these aspects and positive results in overall environmental performance.

▶ **Employee education**

NATEK provides substantial training courses to its employees in order to allow them to follow Company's environmental policy and encourage their involvement in environmental protection activities in the workplace and at home. Those with a role in implementing environmental controls are fully educated and provided with complete instructions for the execution of their responsibilities.

▶ **Internal audits**

NATEK conducts periodic environmental audits at all of its facilities with the aim of ensuring the effective implementation and continual improvement of its environmental management system.

▶ **Observe NATEK environmental policy**

All NATEK Group employees and other individuals working under the NATEK brand adhere to NATEK Environmental Policy. If any individual has an environment-related concern, he/she shall report the situation to his/her manager who shall respond with a prompt measure.





NATEK environmental plan and goals

In accordance with NATEK Environmental Policy, we establish our Environmental Plan consisting of several Environmental Goals and Programs designed to achieve these goals and promote a sense of environmental responsibility over all NATEK Group sites.

NATEK Environmental Goals are reasonably consistent with our Company's size, structure, and conditions and are aimed to enable us to make the improvements necessary to build satisfying environmental standards. The goals introduce necessary changes to our environmental performance and allow us to build an appropriate introductory environmental management system open to continual improvement.

▶ **NATEK continues to keep its environmental system in accordance with legislation of resident country**

▶ **NATEK implements all applicable monitoring measurements for energy, water, and paper consumption**

All relevant NATEK branches monitor and measure the monthly consumption of energy, water, and paper for further statistical purposes. All branches gather all relevant information which is put into the templates. The Person responsible for NATEK Groups' environmental policy then proceeds the data into summarizing chart, which is evaluated for overall performance and achievement of the goals, for which the monitoring measurements are required. This is done at the end of the month when the person responsible for environmental policy requires and gathers all individual branch data at the end of each month.

▶ **NATEK gradually develops and fully implements procedures for a decrease of paper consumption**

We have also introduced the Zero Paper Project in NATEK on a global level, which aims to decrease the number of paper documents to zero. The outcome of the project is to improve the efficiency and comfort of the Employees, thanks to the automation of a number of processes, as well as reducing the paper flow and becoming more sustainable as a company. This also involves reducing the paper flow with our customers and vendors.

▶ **NATEK gradually develops and fully implements procedures for proper waste disposal**

Based on the monitoring of paper consumption, NATEK has implemented a Zero Paper Project on a global level, the aim of which is to gradually reduce the amount of paper documents to zero. The outcome of the project is to improve the efficiency and comfort of Employees, thanks to the automation of many processes, as well as reducing the paper flow and becoming more sustainable as a company. This also involves reducing the flow of documents with our customers and vendors.

The Zero Paper Project considered in detail the gradual decrease of paper consumption through the following measures:

1. All documentation that doesn't have to be printed on paper is stored electronically in local computers,
2. All documentation that does not have to be printed on plain new paper is printed on already used paper which would otherwise go to waste,
3. All internal procedures which outputs currently have to be printed on paper are gradually transferred to an electronic procedure system supported by NATEK Intranet system,
4. Other measures are elaborated after the periodical evaluation of paper consumption monitoring.

► **NATEK reduces total Group consumption of electricity**

After paper consumption, energy is another natural resource that is dominantly consumed by NATEK. In order to decrease energy consumption, the following measures are employed where applicable:

1. All Employees are educated on how to contribute to the decrease of electricity consumption while performing their work
2. Every Employee is obliged to turn off every electrical appliance and machine (e.g. computers, monitors, scanners) when not in use (e.g. when leaving work),
3. The lights in unoccupied rooms should be turned off after an Employee is leaving the room,
4. Other measures are introduced to decrease electricity consumption.

► **NATEK gradually develops and fully implements systems of controls and reviews assessing the Company's environmental performance and fulfillment of the NATEK Environmental Plan**

A system of internal audits revising the fulfilment of Environmental goals is developed and gradually tested in relevant branches. The plan of internal audits is prepared and implemented, and periodical evaluations of the successful utilization of internal audits are going to be proposed.



THANK YOU

for joining us in our effort for good
and sustainable behaviour.

